

ATTACHMENT A
STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

Between at least in or about March 2018 and on or about October 9, 2018, the Defendant, **KIANDRE LARNELL HARRIS** (“**HARRIS**”), **Gilda Faye Brunner** (“**G. Brunner**”), **Dante Williams** (“**Williams**”), and **Kwamain Brunner** (“**K. Brunner**”), and others worked together to distribute and possess with the intent to distribute cocaine base and cocaine.

Beginning in early 2018, investigators from the Montgomery County (Maryland) Police Department, Howard County (Maryland) Police Department, and Drug Enforcement Administration (“the investigators”) began investigating **K. Brunner**, **G. Brunner**, **Williams**, **HARRIS**, and others for distributing cocaine base and cocaine in Southern Maryland.

On January 23, 2018, the investigators observed **Williams** engage in a hand-to-hand drug transaction in the Lincoln Park neighborhood of Rockville, Maryland. The investigators then stopped the drug buyer, who admitted to purchasing marijuana from **Williams**. When the investigators tried to stop **Williams**, **Williams** fled from the investigators, at one point running through a children’s community basketball game. The investigators thereafter detained **Williams** and found on **Williams**’s person 11 grams of cocaine base and 23 grams of marijuana.

In August 2018, a confidential source (“CS1”) told the investigators that **G. Brunner** was distributing cocaine base in Maryland. Between August 24, 2018 and September 7, 2018, the investigators conducted a controlled purchase of cocaine base from **G. Brunner** inside of **G. Brunner**’s apartment in Montgomery Village, Maryland. Between September 19, 2018 and October 3, 2018, the investigators conducted a second controlled purchase of cocaine base from **G. Brunner**, this time in the stairwell of the apartment complex adjacent to **G. Brunner**’s residence.

In June 2018, a second confidential source (“CS2”) told the investigators that “Nephew,” who the source later identified as **K. Brunner**, was selling cocaine in the area of **G. Brunner**’s residence in Montgomery County, Maryland. Between August 27, 2018 and September 10, 2018, the investigators conducted a controlled purchase of cocaine base from **K. Brunner** near **G. Brunner**’s apartment.

In the early hours of October 9, 2018, while executing a lawful search warrant on **G. Brunner**’s apartment in Montgomery Village, Maryland, the investigators encountered **G. Brunner** and **Williams**. During the search, the investigators seized a safe containing a stolen .40 caliber Glock 23 handgun bearing serial number RBG132, 48 grams of cocaine base, 47 grams of powder cocaine, and several bags of marijuana. Next to **Williams**, the investigators found a digital scale covered in powder cocaine and a pair of men’s pants that belonged to **Williams**. In the pocket of those pants, the investigators discovered 9.8 grams of cocaine base. Throughout the

apartment, the investigators found more cocaine base, razor blades, and a second digital scale covered in powder cocaine.

On October 25, 2018, the investigators executed a lawful search warrant on **K. Brunner's** and **HARRIS's** apartment in Columbia, Maryland. As the investigators entered the apartment, **K. Brunner** discarded a Ruger SR40C .40 caliber handgun bearing serial number 345-25085 from the window of the master bedroom. Once the investigators entered the apartment, they found **K. Brunner** in the master bedroom and **HARRIS** in a second bedroom ("**HARRIS's** bedroom").

In the master bedroom (i.e., **K. Brunner's** bedroom), the investigators found approximately \$18,662 in cash, approximately 28.69 grams of cocaine base, a money counter, and a Ruger handgun case. On the ground outside the apartment—under the master bedroom window—the investigators found a Ruger SR40C .40 caliber handgun bearing serial number 345-25085 that **K. Brunner** had discarded from the master bedroom window.

In **HARRIS's** bedroom, the investigators found a large safe containing a Glock 19 9 millimeter handgun bearing serial number 7986LAV, a Glock 23 .40 caliber handgun bearing serial number NMX697, a Glock 21 .45-caliber handgun bearing serial number AYH005US, two loaded magazines, and \$5,523 in bulk cash; and a smaller safe containing five loaded magazines and assorted ammunition. Also in **HARRIS's** bedroom, the investigators found \$659 in a drawer, \$1,208 on the floor next to the bed, several cell phones, and several smaller bags of cocaine base.

In total, the investigators seized approximately \$27,826 in drug proceeds from **K. Brunner's** and **HARRIS's** apartment.

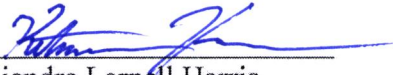
Also on October 25, 2018, the investigators executed search warrants on **K. Brunner's** silver Toyota Camry and **HARRIS's** Nissan Pathfinder parked outside the apartment. In **HARRIS's** Nissan Pathfinder, the investigators found a Glock 26 semi-automatic handgun bearing serial number BBMM888 (which had previously been stolen from its lawful owner), a small glass vile containing phencyclidine (commonly known as "PCP"), a Tylenol bottle containing six oxycodone pills, and drug intervention paperwork in **HARRIS's** name. The investigators thereafter located the key to the Pathfinder in **HARRIS's** room.

At the time **HARRIS** possessed the firearms and ammunition on October 25, 2018, **HARRIS** had been—and knew he had been—convicted of a crime punishable by a term of imprisonment exceeding one year, and his civil rights had not been restored. The firearms and ammunition **HARRIS** possessed were manufactured outside the State of Maryland and thus traveled in interstate or foreign commerce before **HARRIS** possessed them in Maryland on October 25, 2018.

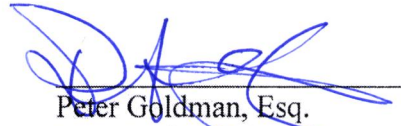
SO STIPULATED:



Gregory Bernstein
Assistant United States Attorney



Kiandre Larnell Harris
Defendant



Peter Goldman, Esq.
Counsel for Defendant